

****Please be advised that the use of these forms may not be proper for your specific legal situation****
****Please make an independent determination whether use of these forms is appropriate****

UNITED STATES DISTRICT COURT
DISTRICT OF NORTH DAKOTA

ND# 3 4852
EEOC# 32 F 2023 00056

Marlon Mozart
Mehu.

(Enter full name of each Plaintiff, above)

vs.

WDAY

(Forum
Communications)
North Dakota
HUMAN RIGHTS + LABOR
(Enter full name of each Defendant, above)

Civil Case No. _____
(To be assigned by Clerk of Court)

§ JURY TRIAL DEMANDED ☒ Yes ☐ No
(Check one)

COMPLAINT

I. JURISDICTION. State the grounds for filing this case in Federal Court (include federal statutes or U.S. Constitutional provisions).

in efforts in communication w/ the
defendants) I have reason to believe I am
being silenced in regards to a pending litigation
of a violation of Title VII laws pertaining to
Racial Discrimination / Racial profiling and breach
of contract.

SAMPLE COMPLAINT

II. PLAINTIFF. For each Plaintiff list: name and address including City, County and State.

Marlon Mehu - 2414 17th St S. FARGO
58103
APT 105.

III. DEFENDANT. For each Defendant list: name and address including City, County and State.

- Forum Communications Company - Jeff Nelson
101 5th St. N, FARGO ND 58102 - Drew Trafton
Individuals.
- North Dakota Department of Labor and Human Rights. Individuals
Kathy Kulesa.
600 E. Boulevard Ave Department.
406, Room 107, Bismarck, ND
58505.

IV. CLAIM. State the facts of your claim. Include the name of each person involved, dates and places. Be as specific as possible. Do not give any legal argument or cite any cases or statutes. Use additional sheets of paper if necessary.

over 3 months of electronic communication 10 messages all together in regards to a breach of contractual duties; WDAY (Forum Communications) has sabotaged my contractual agreements in ^{company} a manner that was counter to Title VII laws and regulations.

- Kathy Kulesa on March 9th saided an offer was rendered to me from WDAY and a counter offer was sent back via email unanswered for more than two months.

- Drew Trapton falsified contracts to lure me away from an already established career to only lie about stipends and bonuses.

V. ADMINISTRATIVE PROCEDURES. If applicable, state whether your claim was heard by any administrative agencies; the type of proceedings; the date and place of any proceedings; the outcome of any administrative proceedings.

ND Human Rights + Labor
Bismarck
Compliance Investigator

Kiersten S.

701 328 3228

Email: Kierstens@ND.Gov

Last offered:
Severance pay
(4) weeks

Kathy Kulesa

701 328 2031

Email: KKulesa@ND.gov.

VI. RELIEF. State what you want the Court to do for you.

Counter offer:

Compensatory damages - "Front pay"
\$94,000

Compensatory/punitive damages

Emotional distress + Mental anguish
(Racial Discrimination)

12,000,000

total: 12,094,000

VII. SIGNATURE. Each Plaintiff must individually sign this complaint.

Signed this 22 day of May, 2023.



Signature of Plaintiff

marlon mulu

Printed Name of Plaintiff

2414 17th St. S, Fargo

Mailing Address

58103

City, State, Zip Code

224 619 5957

Telephone Number of Plaintiff

Signature of Plaintiff

Printed Name of Plaintiff

Mailing Address

City, State, Zip Code

Telephone Number of Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

Marlon Mehe

Plaintiff(s),

CERTIFICATE OF SERVICE

Case No .

Individuals v.
brow trapton
Jeff Nelson

WDAY (Forum
Communications)

North Dakota Human Rights

Defendant(s).

Labor Department

Individuals
Kathy Kulesa

I hereby certify that an exact copy of the following document(s) was served upon all attorneys of record or upon all parties, if not represented by an attorney, by placing a copy in the United States Mail, postage prepaid, and mailing to their last known address.

Document(s) sent:

Names & Addresses to which the document(s) was sent:

Dated: 5/22/23



Signature of Plaintiff